



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: DEUK-SUNG LIM

Serial No.: 09/603,595

Examiner: LEE, SUSAN SHUK YIN

Filed: 26 June 2000

Art Unit: 2852

For: ELECTRO PHOTO MULTI FUNCTIONAL PERIPHERAL APPARATUS

PATENT
P56132

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#18/ Declaration
Antarctica
10/16/02

DECLARATION

Paper No. 18

Assistant Commissioner for Patents
Washington, D.C. 20231

Sir:

1. I am FRANK J. DYNDY, a resident of Arlington, Virginia. I have read Paper No. 16 in this patent application proceeding and wish to comment on certain statements therein.

I declare as follows:

2. I have worked in various manufacturing plants in the United States as a technician and engineer for periods of time from 1959 to 2001, wherein it was my duty to maintain and repair mechanical equipment, and electrical equipment. I was and still am familiar with the ordinary level of skill of ordinary technicians. My statements as follows are based on my personal experience.

3. Paper No. 16 asserts that a mechanical linkage is equivalent to an elastic spring member such as a tension spring and that they perform the identical function in substantially the same way to achieve substantially the same result. The equivalency is, among other

things, said (for example, at p. 21) to occur in the context of Arai's sheet jam removal device.

4. As a technician I frequently observed and/or serviced linkages and elastic spring members such as tension springs. A common example of a tension spring is a manual garage door opening spring, where the door is coupled to the garage with tension springs. Examples of linkages are transmission control linkages, steering linkages, old fashioned sewing machine treadle linkages, and toy car pedal linkages.

5. A linkage is substantially different from an elastic spring member such as a tension spring. They are substantially different from one another, structurally and in terms of how they operate. First, a linkage is substantially rigid except for such slippage as occurs due to the play, if any, in the links at the pivot points and when the link is functioning. An elastic spring member such as a tension spring is not rigid; it is flexible. Nearly every technician of ordinary skill knows that and they knew it many years prior to Lim's invention. Second, a linkage does not to any substantial degree store mechanical energy when pushed or pulled, but an elastic spring member such as a tension spring does store mechanical energy when flexed (for example, pulled), and it gives up such energy when it is relaxed from such flexing. Nearly every technician of ordinary skill knows that and they knew it many years prior to Lim's invention. Third, they operate in different ways and usually they achieve different results. A spring cushions or dampens a mechanical force applied to one of two objects attached to the respective two ends of the spring. A linkage transmits substantially the same

mechanical force as is applied to one of two objects attached to the respective two ends of the linkage. Nearly every technician of ordinary skill knows that and this has been known many years prior to Lim's invention.

6. When a mechanical assembly to which an elastic spring member such as a tension spring is attached (the mechanical assembly being attached to one end of the spring and a base or comparable structure being attached to the other end of the spring) is pulled, the elastic member resists the pull and stores energy as it is stretched in response to the pull. Nearly every technician of ordinary skill knows that and they knew it many years prior to Lim's invention.. Referring to Fig. 6 mentioned on p. 43 of Paper No. 16, what I just described is inherent from the description or the drawing, in the sense that it necessarily and invariably will occur as described. Every technician of ordinary skill knows that and they knew it many years prior to Lim's invention.. Also, when a tension spring has been extended as described on p. 43 of Paper No. 16, and then is released to permit position guiding members to enter into position guiding holes with which the members are in registration, mechanical energy which has been stored in the spring is released and utilized by the members as they are pressed into the holes. What I just described is inherent from the description or the drawing, in the sense that it necessarily and invariably will occur as described.

I declare, under penalty of perjury that the foregoing statements are true and correct,
to the best of my knowledge, and any opinions expressed are such that I verily believe the
same. Executed in Washington, D.C. on 9 October, 2002.


Frank J. Dynda, P.E.